

Red Cliff Band of Lake Superior Chippewas

"The Hub Of The Chippewa Nation"

RED CLIFF TRIBAL COUNCIL

EPA Region 5 Records Ctr.



349938



July 9, 2009

Patti Krause
USEPA Community Involvement Coordinator
77 West Jackson Blvd (SI-7J)
Chicago, IL 60604

RE: Ashland/Northern States Power Lakefront Site, Proposed Cleanup Plan

Ms. Krause,

The Red Cliff Band of Lake Superior Chippewa appreciates the opportunity to meet and discuss the Ashland/Northern States Power Lakefront Site proposed site remediation plans. We welcome the opportunity to comment on the important work of planning for the restoration of the Chequamegon Bay environment. We would like to submit the following comments on the proposed cleanup.

We agree with the EPA's overall goals for the Site, particularly; reducing or eliminating exposure to contaminants at the site; removing contamination to lessen effects of discharge to the air, land, sediment or water; stopping or minimizing movement of contaminants from the soil to ground water or surface water; and ensuring future beneficial use of land at the site.

We feel that the proposed plan is the combination of options that would best provide site remediation. We would not agree to an on-site landfill of contaminated soils and sediment. We encourage the combination of containment, extraction and in-place treatment to enhance groundwater remediation. Air quality management during remediation will be very important for the health of the community and prevention of the dispersal of site contaminants.

The Band encourages clean up goals of background levels for site contaminants where possible for the site soils and sediments in the Bay. The Band disagrees with the process of utilizing an "acceptable risk" level to calculate clean up levels that leave residual contamination. The Band feels that there is no level of "acceptable risk" for increased rates of cancer or health affects due to contamination, for people or wildlife. We are interested in following the remediation design process for actual site work feasibility and the process by which remediation goals will be confirmed as site work progresses.

Please keep us informed as this project progresses. You may contact Tracey Ledder, Environmental Program Director, 715-779-3650, if you have questions or information.

Sincerely,

Rose Gurnoe-Soulier
Tribal Chair